



September 16, 2013

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554.

**Re: Modernizing the E-Rate Program for Schools and Libraries,
WC Docket No.13-184**

Dear Secretary Dortch:

As explained below, the Commission should expand the E-rate program to include mobile broadband Internet access inside and outside of schools and libraries, and provide funding for mobile devices such as smartphones and tablets, so that America's poorest and most vulnerable students can have anywhere/anytime access to the same learning tools (such as educational videos, online collaboration tools, and online encyclopedias) that other students have used for years to enrich their learning.

I am a venture capitalist who invests in early-stage educational technology businesses, and I am also a former college English professor with a Ph.D. from Yale University who taught at Bowdoin College and the City University of New York. As a CUNY professor, I helped prepare many New York City K-12 public school teachers, and I was myself a member of the American Federation of Teachers and the New York State Teachers Union. I care deeply about education and about preparing our nation's poorest and most vulnerable students for engaged, productive lives, and careers.

The Commission's E-Rate Program has played a critical role in moving our nation's schools into the 21st century, and I wish it had substantially more funding. I am concerned, though, that the recent Notice of Proposed Rulemaking outlines changes that will substantially reduce the effectiveness of this critical program.

Nothing in the new proposed rules is inherently bad: fiber and Wi-Fi are helpful. But to focus solely on fiber and Wi-Fi is tragically backward-looking. The crucial movement in education and every other sector, both in America and globally, is toward true mobile broadband Internet access. To have anything like a fair chance in life, America's poorest and most vulnerable children need Internet access in their homes, their community centers, their workplaces, on buses, and anywhere else where they can find a few minutes to do their schoolwork, study, or perform research.

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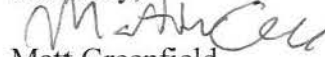
With mobile Internet access, students equipped with tablets or smartphones can at the tap of a finger enter a wide universe of educational materials and opportunities for research and collaboration. They can browse widely and dig deep. They can become better students. And they can also learn by helping their families with crucial civic and practical tasks, from researching government poverty programs to finding doctors to locating healthy foods to starting petitions that protest injustices. If students can access the web only while at school, they will do less, and they will teach less to other members of their families.

Most who read this plea, whether a government official or an informed citizen, probably belong to the privileged minority in this country with ready access to decent food, clean water, and broadband Internet. It can require a real act of imaginative sympathy to understand what life is like for people without those things. Broadband Internet access is one of those things we take for granted, just as those of us who are not blind take our sight for granted. Spending ten minutes of your day, even in your own office, with a blindfold on can give you a deeper understanding of the struggles of the blind. Let me ask you to conduct a similar thought experiment concerning Internet access. If you are like me, you probably spend many hours a day finding and perusing information and messaging and collaboratively authoring on the Internet. Now imagine that all of your mobile devices have been taken away, and you can access the Internet for only a few minutes a day, in particular places, and then only to perform specific tasks assigned by someone else. Imagine how crippling that would be to every aspect of your life. Not only would you be unable to accomplish even the simplest practical tasks (making a lunch date, comparing prices, etc.), you would also find your horizons narrowing, your community shrinking. If you were denied access for long enough, your sense of your fundamental capacities, your agency as a human being, would be diminished.

Now consider that if you are reading this, you are probably an adult. We are attempting to prepare America's under-privileged kids for a future that is more mobile, more connected, and more continuously collaborative than we can even imagine. I think in two decades people will look back on the current moment as a barbarous one for its failure to consider mobile Internet access a crucial foundation for education and possibly even a basic human right.

Thus, the FCC should reform the E-rate program more broadly, to include funding for mobile broadband Internet access and devices so that underprivileged students will have the type of anywhere/anytime access that those of us in the privileged minority take for granted.

Sincerely,



Matt Greenfield

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